

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

ROBERT KELLER,)
v. Plaintiff,)
KHALIF KARRIEM and REAL TIME) Removed from the Circuit Court
ARRIVE, INC.,) of Williamson County
Defendants.) Case No.: 2022-337

NOTICE OF REMOVAL

Defendants Khalif Karriem and Real Time Arrive, Inc. (collectively, "Defendants") give notice of the removal of this case from the Circuit Court for Williamson County, Tennessee to the United States District Court for the Middle District of Tennessee under 28 USC § 1446(a). As grounds for removal, these Defendants would show the Court as follows:

1. Plaintiff filed a Complaint in the Circuit Court of Williamson County, Tennessee on 13 July 2022 (Case Number 2022-337), naming Defendants Khalif Karriem and Real Time Arrive, Inc.

2. Defendant Khalif Karriem was served with a copy of the Complaint in this action on 13 September 2022¹. Defendant Real Time Arrive, Inc. was served with a copy of the Complaint on 26 July 2022 and was granted an extension to file a responsive pleading by 15 September 2022. Therefore, this Notice of Removal is timely filed.

¹ Plaintiff's counsel advises service was attempted on Defendant Khalif Karriem through the Tennessee Secretary of State but there was no return of service. Defendant Karriem sent discovery responses dated 16 August 2022 directly to Plaintiff's counsel. The undersigned counsel agreed to accept service on behalf of Defendant Kariem on 13 September 2022 via email and Plaintiff's counsel's office emailed the summons to the undersigned counsel on 13 September 2022.

3. Plaintiff is a citizen of the State of Tennessee.

4. Defendant Khalif Karriem is, and was at the time this action was commenced, a citizen of the State of Illinois. Defendant Khalif Karriem is not a citizen of the State of Tennessee.

5. Defendant Real Time Arrive, Inc. is, and was at the time this action was commenced, a registered California corporation with its principal place of business in Los Angeles, California. Defendant Real Time Arrive, Inc. is not a registered entity in the State of Tennessee.

6. This is a civil action over which this Court has original jurisdiction. The amount in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs, and this action is between citizens of different States. 28 USC § 1332(a).

7. Any civil action brought in a State court of which the district courts of the United States have original jurisdiction may be removed by the defendant to the district court of the United States for the district and division embracing the place where such action is pending. 28 USC § 1441(a).

8. True copies of all pleadings filed to date in this action by any party are attached as collective **Exhibit A**.

9. These Defendants are filing a copy of this Notice of Removal with the Circuit Court of Williamson County, Tennessee and are sending a copy of the Notice of Removal to all interested parties under 28 USC § 1446(d).

Defendants respectfully request that Case Number 2022-337, now pending in the Circuit Court of Williamson County, Tennessee be removed to this Honorable Court.

Respectfully submitted,

FREEMAN MATHIS & GARY, LLP

By: /s/ Jason M. Pannu

Jason M. Pannu, BPR No. 023816
424 Church Street, Suite 2000
Nashville, Tennessee 37219
jason.pannu@fmglaw.com

and

COX, PLLC

Clinton V. Cox, IV, *PHV forthcoming*
O. Luke Davis, III, *PHV forthcoming*
8144 Walnut Hill Lane, Suite 1090
Dallas, Texas 75231
ccox@coxpllc.com
ldavis@coxpllc.com

*Counsel for Defendants Khalif Karriem and Real
Time Arrive, Inc.*

CERTIFICATE OF SERVICE

This is to certify that on this the 15th day of September 2022, a copy of the foregoing NOTICE OF REMOVAL was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access the filing through the Court's electronic filing system.:.

<input type="checkbox"/> Hand <input type="checkbox"/> Mail <input type="checkbox"/> Fax <input type="checkbox"/> FedEx <input checked="" type="checkbox"/> Email <input checked="" type="checkbox"/> CM/ECF	Blair P. Durham Choucey D. Fuller Bart Durham Injury Law 404 James Robertson Parkway Suite 1712 Nashville, Tennessee 37219 blair@bartdurham.net cfuller@bartdurham.net <i>Counsel for Plaintiff</i>	<input type="checkbox"/> Hand <input type="checkbox"/> Mail <input type="checkbox"/> Fax <input type="checkbox"/> FedEx <input checked="" type="checkbox"/> Email <input checked="" type="checkbox"/> CM/ECF	Lynn Vo Lawyer Law Offices of Lynn Vo Lawyer P.O. Box 2903 Hartford, Connecticut 06104-2903 llawyer@travelers.com <i>Counsel for UM/UIM Carrier Travelers Property Casualty Insurance Company</i>
-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

/s/ Jason M. Pannu

Jason M. Pannu